

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHARLES HENRY EVANS and	:	CHAPTER 13
JODIE ANN EVANS	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CHARLES HENRY EVANS and	:	
JODIE ANN EVANS	:	
Respondent(s)	:	CASE NO. 4-17-bk-03131

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 14th day of September, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

a. Plan ambiguous -

- (1) Length 36 or 37
- (2) Bank payments Section 2(A) not allowed.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 19th day of September, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Charles and Jodie Evans
12 South Maple Street
Mount Carmel, PA 17851

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee